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August 27, 2015

Via Electronic Filing and Email

The Honorable Mary Geiger Lewis
United States District Court Judge
Matthew J. Perry, Jr. Courthouse
901 Richland Street
Columbia, SC 29201

Re: Oak Ridge Tool-Engineering Inc. v. Shaw Areva MOX Services LLC
Case No. 3:13-cv-992-MGL

Request for Status Conference

Dear Judge Lewis:

The purpose of this letter is to request a status conference with Your Honor regarding various issues that have recently arisen in the above-referenced matter.

On August 11, 2015, the Court granted ORTE's motion to amend its complaint. Since that time, a series of things have taken place that we believe warrant a status conference with the Court to identify and coordinate additional pretrial activities, including:

- ORTE has amended its pleadings to add new factual allegations and new claims for relief (Dkt. No. 155);
- MOX Services has filed its responsive pleading with new affirmative defenses, factual allegations, and counterclaims (Dkt. No. 160);
- MOX Services has filed a motion asking the Court to amend its August 11th Order to authorize additional discovery on ORTE's new allegations and claims (Dkt. No. 161); and
- MOX Services has identified additional materials that are responsive to ORTE's prior discovery requests, some of which have previously been produced and others of which are undergoing the requisite security review required by federal regulations.

In addition to these post-August 11th events, ORTE also produced on August 4th a series of new documents that it received in response to a FOIA request, as well as new photographs of the subject matter at issue in the case.

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Based on the case's current posture, we believe it would be productive for the parties and Your Honor to catch up either by telephone or in person in order to discuss the many discovery, planning, and scheduling issues that these recent activities have triggered.

If this request is agreeable with the Court, we are pleased to make ourselves available at Your Honor's convenience.

With kindest regards, I remain

Very truly yours,

/s/ Kevin A. Hall

cc: All Counsel of Record